



July 20, 2007

Federal Trade Commission/Office of the Secretary
Room H-135 (Annex M)
600 Pennsylvania Avenue
Washington, DC 20580

Subject: Comments to Fuel Economy Guide Review, Matter No. R7811008

The following are the comments of the Alliance of Automobile Manufacturers ("Alliance") to the Federal Trade Commission (FTC) review of the Fuel Economy Guide, Matter No. R7811008.

The Alliance supports the continued publication of the Fuel Economy Guide, and values the guidance that it provides to manufacturers. The Fuel Economy Guide is an important industry standard and it should be kept up-to-date as EPA's regulations are updated and as advances are made in vehicle technologies and fuels. The current guidelines have resulted in disclosures that are both informative to the consumer and not overly burdensome to the manufacturers.

The following are specific comments to the text of the Fuel Economy Guide:

1. The definition of "New automobile" in §259.1(a) should be revised to reflect the addition of medium duty passenger vehicles to the set of vehicles that will require a fuel economy label beginning with 2011 models. At that time, a fuel economy label will be required for passenger automobiles, light trucks and medium duty passenger vehicles. Also, the citation to the Energy Policy and Conservation Act should be updated to 49 U.S.C. 32901 *et seq.*
2. In §259.1(b) and (c) the term "fuel economy" should be used when referring to miles-per-gallon, instead of "consumption" or "mileage". Fuel economy is the standard industry term and is readily understood by the public. In addition, references solely to gasoline should be avoided, since many vehicles today are also being fueled by alternative fuels, such as E85 and diesel.

Accordingly, in §259.1 Definitions, we recommend the following changes. In addition, the reference to the EPA regulations should be changed as shown:

**BMW Group • DaimlerChrysler • Ford Motor Company • General Motors • Mazda
Mitsubishi Motors • Porsche • Toyota • Volkswagen**

§259.1 Definitions

(a) *New automobile*. Any passenger automobile, light truck or medium duty passenger vehicle for which a fuel economy label is required under the Energy Policy and Conservation Act (49 U.S.C. 32901 *et seq.*) or rules promulgated thereunder,....

(b) *Estimated city mpg*. The ~~*fuel economy* gasoline fuel consumption or mileage~~ of new automobiles as determined in accordance with the city test procedure employed and published by the U. S. Environmental Protection Agency as described in ~~40 CFR 600.209-85~~ 40 CFR 600.210 and expressed in miles-per-gallon.....

(c) *Estimated highway mpg*. The ~~*fuel economy* gasoline consumption or mileage~~ of new automobiles as determined in accordance with the highway test procedure employed and published by the U.S. Environmental Protection Agency as described in ~~40 CFR 600.209-85~~ 40 CFR 600.210 and expressed in miles-per-gallon.....

If the FTC intends to make substantive changes to the Guide based upon its current review, we request that the Alliance and its members be provided with an opportunity to comment on the changes due to the importance of the Guide to our industry.

If you should have any questions regarding these comments, please contact me at (248) 357-4796.

Sincerely,

Giedrius Ambrozaitis
Manager, Mobile Sources